





From: "Jackie Joyce" < Jackie. Joyce@state.co.us>

To: (b) (6)

Subject: Re: Comanche Power Plant
Date: Mon, 07 Mar 2005 07:38:01 -0700

Joan,

I put a copy of the CD with the Comanche Unit 3 revised application in the mail to you this morning. The original application was submitted on August 6, 2004, with a supplement received on September 10, 2004. The revised application was submitted on January 19, 2005 and includes the provisions of the settlement agreement PSCo entered into with various citizen groups. I gave you a copy of the January 19, 2005 application.

I should clarify the permitting status for you. The current Title V permit for Comanche is on our web page. However, the current Title V permit does not address the proposed new Unit 3. PSCo will be getting construction permits for the proposed new Unit. In addition, PSCo will be getting construction permits for any other new equipment associated with the Unit 3 project, as well as construction permits for existing modified equipment. Currently, draft construction permits, as well as the preliminary analysis have been sent to PSCo for a pre-public comment review period. At this time those construction permits and preliminary analysis are considered public and under a FOIA request you could review them. I can e-mail you electronic copies of them or you can come in and look at them. There are 10 permits and the preliminary analysis is somewhat lengthy (about 65 pages).

When the public comment period begins, the draft permits and preliminary analysis will be on our web site for review.

Note that eventually the construction permits issued for the Unit 3 project will be included in the Title V permit, but that is some years down the road. The application to revise the Title V permit is not required until 12 months after Unit 3 commences operation and startup for Unit 3 is not expected until sometime in 2009.

I will send you an e-mail later on your modeling questions. Let me know if you have any questions. my number is 303-692-3267.

SANTARELLA & ECKERT, LLC

TELEPHONE: 303-932-7610

FACSIMILE: 303-932-7316

7050 PUMA TRAIL LITTLETON, CO 80125

VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

March 10, 2005

Corporation Service Company Registered Agent for Xcel Energy, Inc. 1560 Broadway Denver, CO 80202

Corporation Service Company Registered Agent for Public Service Company of Colorado 1560 Broadway Denver, CO 80202

Notice of Intent to File Suit Pursuant to Section 304 of the Clean Air Act, 42 U.S.C. § 7604 for alleged PSD Permit Program Violations – Comanche Station, Pueblo, CO

Dear Sirs or Madams:

Re:

The Rocky Mountain Environmental Labor Coalition ("RMELC"), through counsel, hereby provides formal notice in accordance with section 304(b) of the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. § 7604(b) to Xcel Energy, Inc., and the Public Service Company of Colorado d/b/a Xcel Energy ("PSCo") and relevant federal and state officials of RMELC's intent to commence a civil action against Xcel Energy, Inc., and PSCo pursuant to section 304 of the CAA, 42 U.S.C. § 7604, with regard to Xcel Energy, Inc.'s and PSCo's operation of a coal-fired steam-electric generating station known as Comanche Generating Station ("Comanche Station") located near Pueblo, Colorado. RMELC, with a principal place of business at 404 North Spruce Street, Colorado Springs, Colorado 80905, is a non-profit corporation dedicated to ensuring a balance between rapid population growth, labor interests and the preservation of the natural environment throughout the Rocky Mountain region. RMELC members work, reside and recreate in the Pueblo area and are affected by the Comanche Station operations and the alleged violations set forth herein.

RMELC alleges that Xcel Energy, Inc., and PSCo have violated at various times since at least 1994 to the present and may be in continuing violation at the Comanche Station of section 165(a) of the CAA, 42 U.S.C. § 7475(a), and the underlying federal and state prevention of significant deterioration ("PSD") regulations set forth at 40 C.F.R. Part 52 and the Colorado State Implementation Plan ("SIP") as set forth at Colorado Air Quality Control Commission

Notice of Intent To File Suit Registered Agents for Xcel Energy, Inc., and PSCo 3/10/2005 Page 2 of 5

("CAQCC") Regulation No. 3, Part D, which make unlawful the construction or major modification of a major emitting facility after August 7, 1977, in an attainment area unless a PSD permit that sets forth emission limitations has been issued for such proposed facility. Xcel Energy, Inc., and PSCo have modified and operated the Comanche Station without obtaining New Source Review ("NSR") PSD permits authorizing the construction and operation of physical modifications of Comanche Station's Unit 1 and 2 as required by the CAA. These violations of the CAA and the SIP of Colorado have resulted in the release of massive unpermitted and, therefore, illegal amounts of air pollutants including, *inter alia*, Sulfur Dioxide ("SO₂"), Nitrogen Oxides ("NO_x") and/or Particulate Matter ("PM") into the environment. Until these violations are corrected, Xcel Energy, Inc., and PSCo may continue to release massive amounts of illegal emissions into the environment.

Pursuant to Part C of Title I of the CAA, the Colorado SIP requires that no construction or operation of a major modification of a major stationary source occur in an area designated as attainment without first obtaining a permit under federal regulations set forth at 40 C.F.R. § 52.21, and prohibits the operation of a major stationary source after a major modification unless the source has applied the Best Available Control Technology ("BACT") pursuant to 40 C.F.R. § 52.21(j) and the Colorado SIP at 5 Code of Colorado Regulations ("CCR")1001-5. The PSD provisions of the Colorado SIP, as implemented by CAQCC Regulation No. 3, require that no emission unit or source subject to PSD shall be constructed without obtaining an air construction permit in compliance with PSD requirements.

As set forth in the Notice of Violation ("NOV") issued by the United States Environmental Protection Agency ("EPA") to Xcel Energy, Inc., on June 27, 2002, (Attachment 1) which is incorporated herein by reference, RMELC asserts that the following physical changes or changes in the method of operation made to Comanche Station's Unit 1 and 2 and related pollution control equipment since at least 1994 have resulted in a significant net emission increase in emissions of SO₂, NO_x, and/or PM from Units 1 and 2 and related pollution control equipment into the atmosphere equal to or in excess of the rate of net emissions increase of said pollutants as set forth at federal regulations at 40 C.F.R. §§ 52.21(b)(3) and (23)(i) and the Colorado SIP Rules at CAQCC Regulation No. 3, Part D, Section II.A.27 and Section II.A.44.

The major modifications at Comanche Station include, *inter alia*, the following physical or operational changes and related pollution control equipment, alone or in combination:

- (1) Reheater redesign and replacement at Comanche Station's Unit 2 was completed in 1994; and
- (2) Replacement and redesign of a reheater and arch wall at Comanche Station's Unit 1 was completed in 2000.

Notice of Intent To File Suit Registered Agents for Xcel Energy, Inc., and PSCo 3/10/2005 Page 3 of 5

RMELC alleges that these physical changes or changes in method of operation made to Comanche Station's Unit 1 and Unit 2 and related pollution control equipment are major modifications within the meaning of 40 C.F.R. § 52.21(b)(2)(i) and CAQCC Regulation No. 3, Part D, Section II.A.23. Xcel Energy, Inc., and PSCo, therefore, were required to submit a PSD permit application to the Colorado Air Pollution Control Division ("APCD"), obtain a PSD permit from APCD, and comply with other PSD permit program requirements including the application of BACT for each pollutant regulated under the CAA for which there would be a significant net emissions increase at the source **prior** to the major modifications of Comanche Station's Unit 1 and Unit 2 and related pollution control equipment in accordance with section 165 of the CAA, 42 U.S.C. § 7475, federal regulations set forth at 40 C.F.R. § 52.21, and state regulations set forth at CAQCC Regulation No. 3, Part D. RMELC further alleges that Xcel Energy, Inc., and PSCo have violated and may continue to violate these PSD permit requirements applicable to Comanche Station's Unit 1 and Unit 2 and related pollution control equipment.

The CAA and the underlying regulations set forth at 40 C.F.R. Part 54 require 60-day notice of intent to file suit for claims brought pursuant to section 304(a)(1) and (2) of the Act, 42 U.S.C. § 7604(a)(1) and (2), be given to the alleged violator, the Administrator of the EPA, the Regional Administrator of EPA for the Region in which the violations are alleged to have occurred, and an authorized representative of the State Agency charged with responsibility for air pollution control in the State.

However, the 60-day notice requirement set forth at section 304(b)(1) of the Act, 42 U.S.C. § 7604(b)(1), does not apply to actions brought in federal district court pursuant to section 304(a)(3) of the CAA, 42 U.S.C. § 7604(a)(3), against a person who proposes to construct or constructs any new or modified major emitting facility without a PSD permit. See United Steelworkers of America v. Oregon Steel Mills, Inc., 322 F.3d 1222, 1227 (10th Cir. 2003). Accordingly, RMELC is not required to wait 60 days before initiating an action to enforce the PSD permit violations set forth in this Notice Letter and the attached NOV.

This letter constitutes **NOTICE OF INTENT TO SUE** Xcel Energy, Inc., and PSCo by RMELC for alleged violations of the CAA at the Comanche Station as described herein. In RMELC's lawsuit, which may be brought at any time, RMELC intends to seek, *inter alia*, the following relief:

(1) A declaratory judgment ordering Xcel Energy, Inc., and PSCo to obtain a PSD permit for Comanche Station from APCD for each pollutant regulated under the CAA for which there would be a significant net emissions increase at the source including, inter alia, SO₂, NO_x, and PM due to major modifications made to Units 1 and 2 and related pollution control equipment from 1994 until 2000;

Notice of Intent To File Suit Registered Agents for Xcel Energy, Inc., and PSCo 3/10/2005 Page 4 of 5

- (2) Injunctive relief to ensure compliance with applicable CAA PSD permit program requirements set forth in applicable federal and state regulations with regard to Comanche Station's Unit 1 and Units 2 that have been subject to major modifications; and
- (3) The assessment of appropriate civil penalties for each violation of the PSD requirements alleged herein at Comanche Station pursuant to section 304(g)(1) of the CAA, 42 U.S.C. § 7604(g)(1).

Section 113 of the CAA, 42 U.S.C. § 7413, provides for civil penalties of not more than \$25,000 per day for each violation on or before January 30, 1997. Moreover, in accordance with the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, a court may assess \$27,500 per day for each violation after January 30, 1997, through March 15, 2004, and \$32,500 per day for each violation after March 15, 2004, pursuant to 40 C.F.R. § 19.4.

Please do not hesitate to contact me at the telephone number set forth above if you have any questions regarding this notice letter including clarification of the violations alleged herein or are interested in discussing settlement.

Very truly yours,

Joseph M Santarella Jr. Attorney at Law

·Counsel for RMELC

cc: Governor Bill Owens
State of Colorado
136 State Capitol Building
Denver, CO 80203-1792
(Via Certified Mail/Return Receipt Requested)

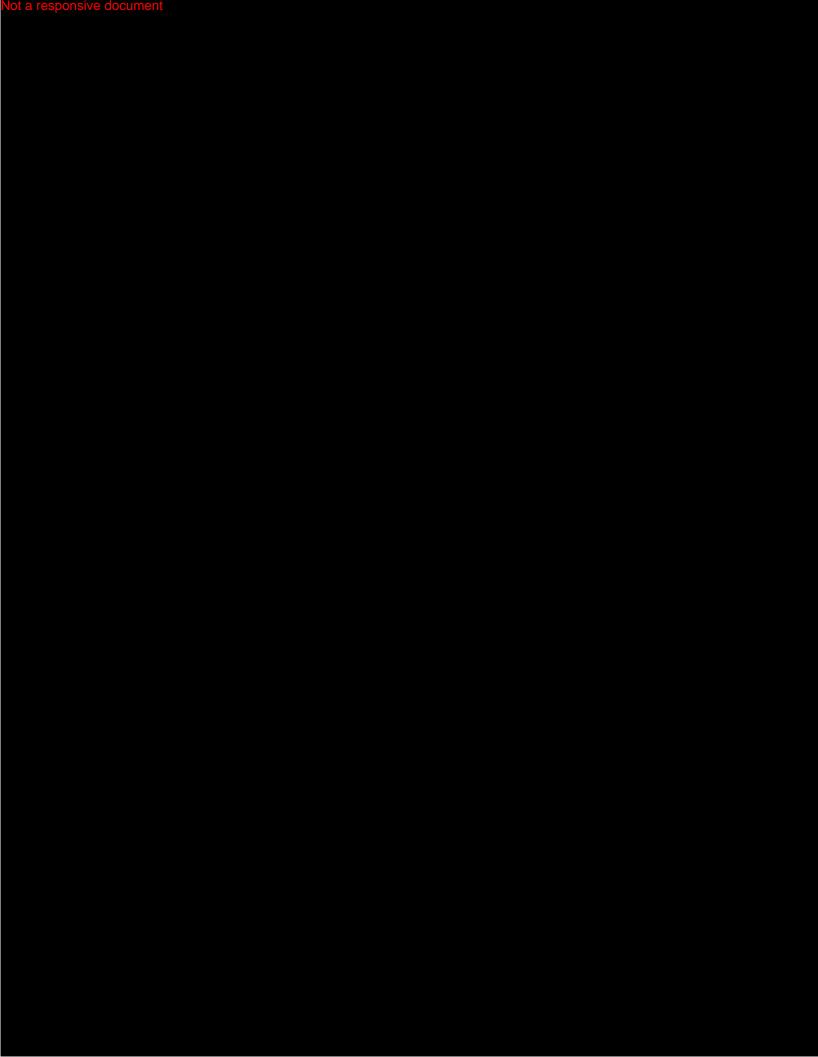
Mr. Douglas H. Benevento Executive Director Colorado Department of Public Health & Environment 4300 Cherry Creek Drive South Denver, CO 80246-1530 Notice of Intent To File Suit Registered Agents for Xcel Energy, Inc., and PSCo 3/10/2005 Page 5 of 5

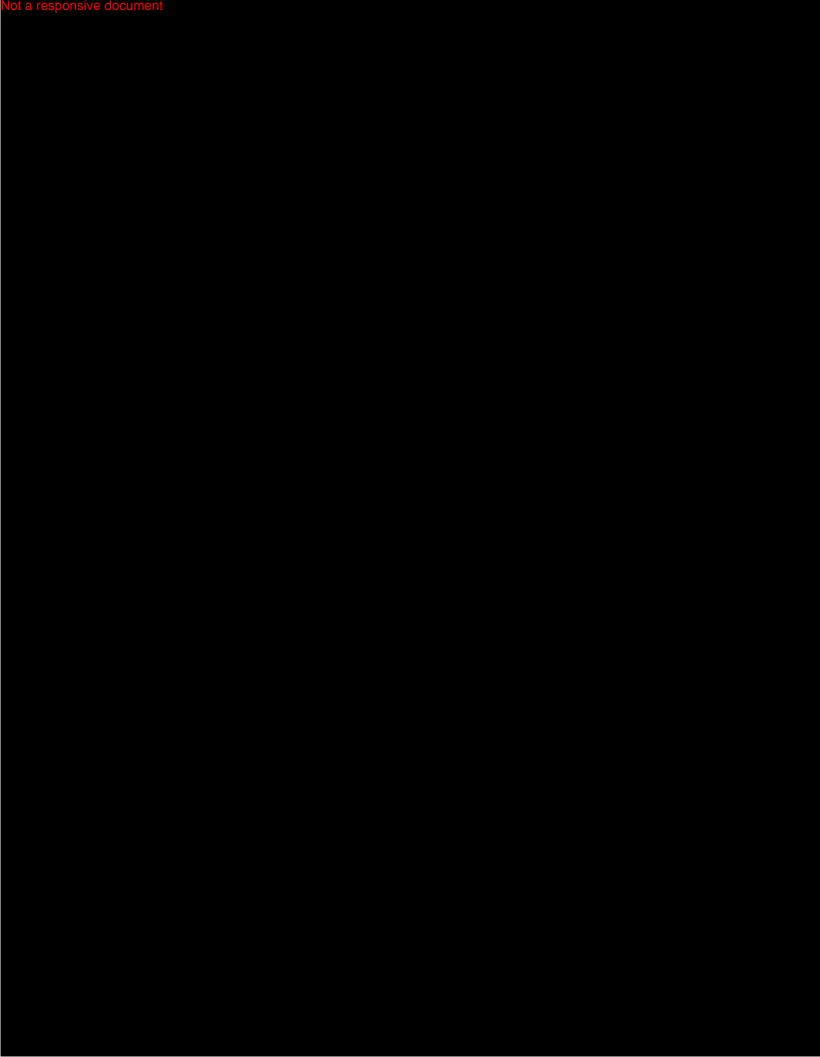
(Via Certified Mail/Return Receipt Requested)

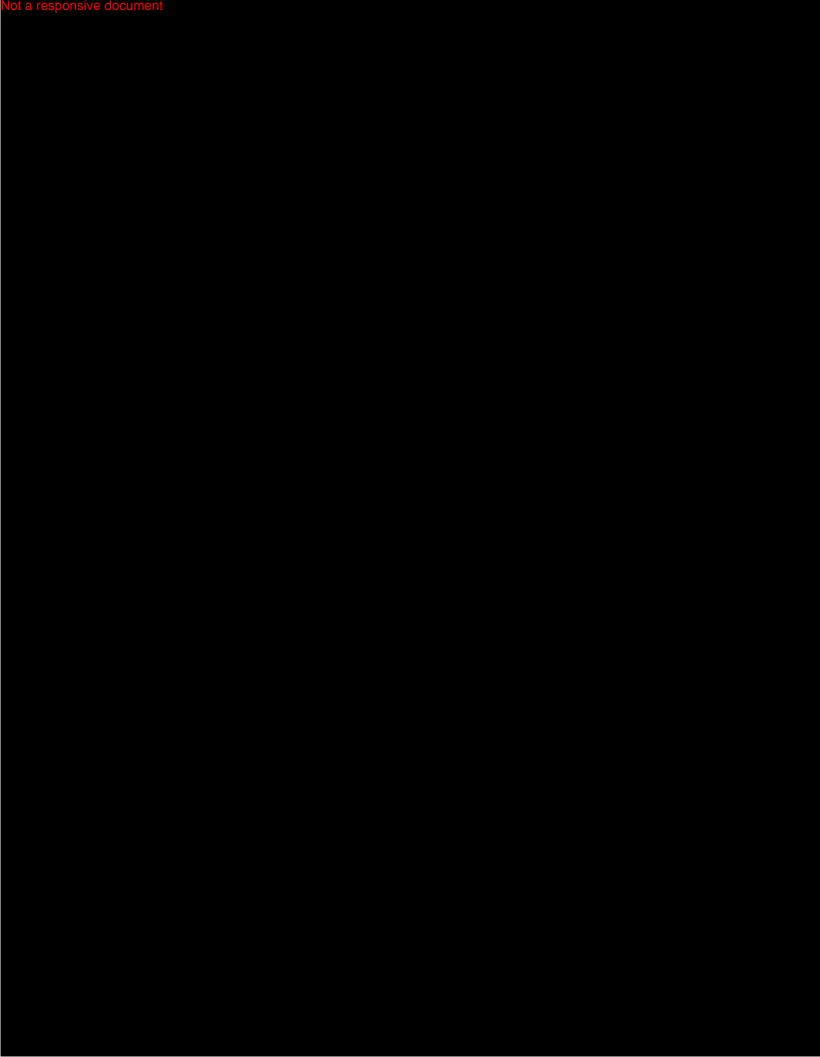
Mr. Robbie Roberts
Regional Administrator
United States Environmental Protection Agency
Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466
(Via Certified Mail/Return Receipt Requested)

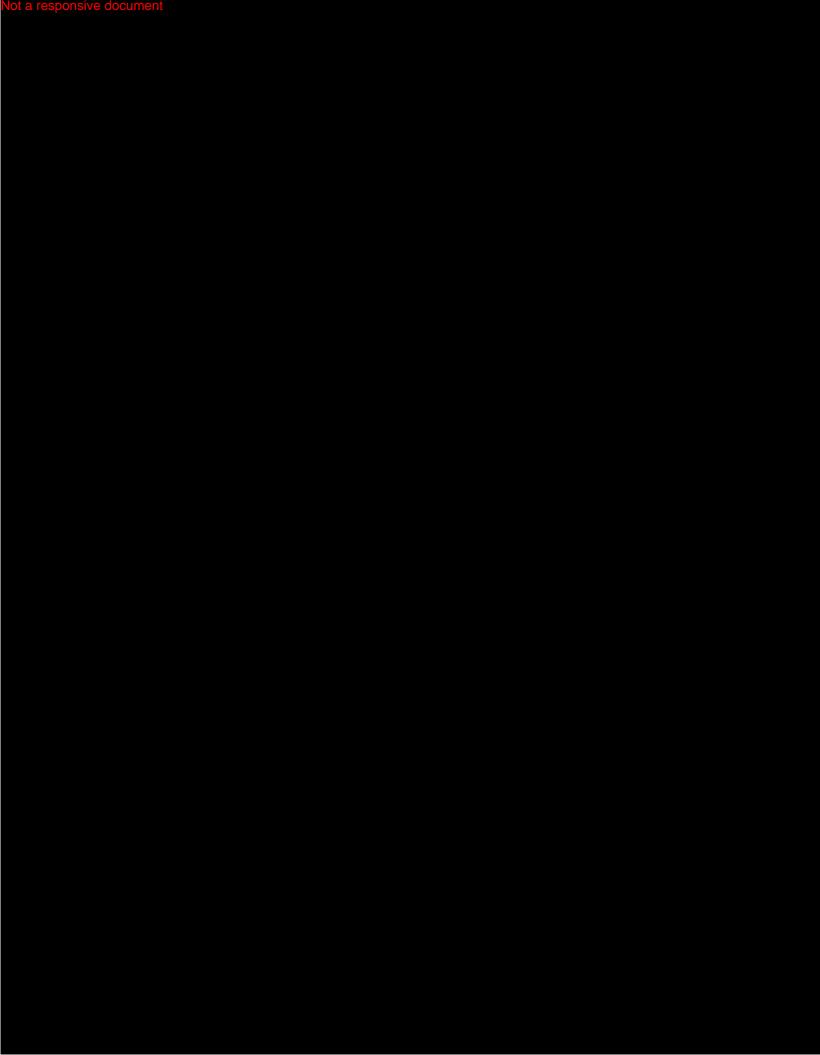
Mr. Stephen L. Johnson
Acting Administrator
United States Environmental Protection Agency
Ariel Rios Building (1102A)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
(Via Certified Mail/Return Receipt Requested)

Mr. Alberto Gonzales
Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001
(Via Certified Mail/Return Receipt Requested)











Frank P. Prager Assistant General Counsel



1225 17th Street, Suite 900 Denver, Colorado 80202-5533

Phone: **303.294.8108** Fax: 303.294.8255

March 13, 2001

By Hand Delivery

Albion Carlson (8ENF-T)
United States Environmental Protection Agency
Region VIII
999 18th Street, Suite 300
Denver, Colorado 80202-2466

RECEIVED

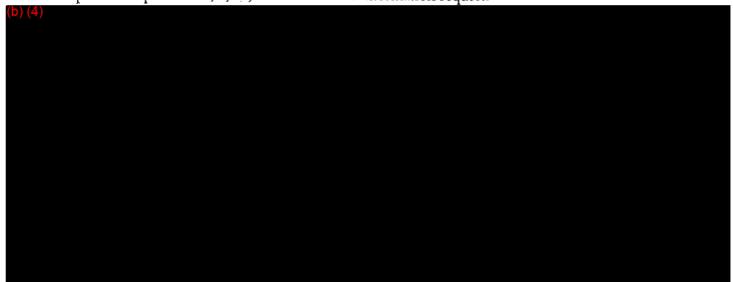
MAR 13 2001

Office of Enforcement Compliance & Environmental Justice

Re: Request for Information Pursuant to Section 114(a) of the Clean Air Act Regarding EPA's Coal-Fired Power Plant Investigation – Fourth Response of Public Service Company of Colorado, Pawnee Station

Dear Mr. Carlson:

On January 2, 2001, Public Service Company of Colorado ("PSCo") received a request for information pursuant to Section 114(a) of the Clean Air Act regarding PSCo's Pawnee Station. By letter from PSCo's counsel (Bill Bumpers) dated January 16, 2001, PSCo provided a schedule for its responses to the information request. As set forth in that schedule, PSCo herewith provides responses to questions 5, 7, 13, and 14 from the information request.



Question 7. "Monthly and annual emissions (lb/mmBTU and tons/year) of the following air pollutants. Emissions information responsive to this request includes emissions reports submitted to the applicable state regulatory agency, and all data obtained from any continuous

Mr. Albion Carlson March 13, 2001 Page 2

emission monitor (CEM) installed in the flue gas stream. [Specify the timeframes and pollutants, where New Source Performance Standards (NSPS) emissions data has already been reported to the U.S. EPA, (i.e. Acid Rain CEM data/reports, NSPS data/reports, etc.). Acid Rain CEM data that has been submitted to EPA to comply with applicable NSPS requirements does not have to be resubmitted to satisfy this Section 114 information request letter]:

- (1) NOx,
- (2) SO₂,
- (3) PM and PM10,
- (4) Air Toxics (Pb/Hg/HCl/Other)."

Response. Air Pollution Emission Notices (APENs) submitted to the state of Colorado from 1991 to the present are enclosed with this letter. With the exception of the Acid Rain CEM data explicitly excluded by EPA from the response, PSCo has not calculated or submitted any other monthly or annual emissions information related to the Pawnee station to the state regulatory agency.



(b) (4)

The information and documents submitted in response to questions 5, 13, and 14 constitute Confidential Business Information as set forth in 40 C.F.R. §§2.201-2.311. Accordingly, the information and documents should not be made available as public information and the procedures and protections set forth in 40 C.F.R. §§2.100-2.121 should be followed upon request for or disclosures of the diagrams. The information and documents have been marked as Confidential Business Information.

PSCo is continuing the process of gathering and reviewing the voluminous documents requested by EPA in response to the other questions contained in the request for information. Should PSCo identify additional documents that are responsive to the questions for which responses have been provided in this letter, it will supplement its response.

Very truly yours,

Frank P. Prager/

Attorney for Public Service Company of Colorado

Enclosures cc: Bill Bumpers, Esq.

AIR PULLUTANT EMISSION NOTICE PERMIT No.: 11MO674 AIRS ID . 087 0011 001 FIRM NAME Public Service Company of Colorado MAIL ADDRESS 550 15th Street, Ste 1000, Denver, Colorado 80202 STATE: CO ZIP: 80202 PLANT NAME & LOCATION Paynee Station, 14940 County Rd 24, Brush, CO 80723 COUNTY: Morgan HOME-BASE FOR PORTABLE SOURCES. PERSON TO CONTACT REGARDING THIS INFORMATION Gary Magno TITLE Environmental Coordinator PHONE (303) 571-7026 GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION Flectric Power Generation A. GENERAL INFORMATION Normal Operation of This Source Process Seasonal Throughput (% of Annual) ADDITIONAL INFORMATION OF REMARKS No. of Employees Land Area Hours Day Days Week Weeks Year Dec-Feb Mar-May Jun-Aug Sep-Nov B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout) Diameter Temperature How Rate Velocity Height Plant ID No. for Stack n ACEM A min C. FUEL INFORMATION Design Input Rate Annual Fuel Consumption Fuel Heating Value: Per Cent by Weight | Seasonal Fuel Use (% of Annual Use) | Space Htm (106 BTU HR) Kind of Fuel (BTU lb. BTU gal. (°o Ann.) Description of Combustion Unit or Output or BTU SCF) Burned Boiler #1 (HP kW) Requested leve Data year level Sulfur Dec-Feb Mar-May Jun-Aug Sep-Nov Ash 0 2 504 910 tons Coal 8 389 BTU lb 0.34 47 0006 Make Model: Gas 53,637 mcf 937 BTU/scf Serial No. D. PROCESS INFORMATION RAW MATERIALS Process Design Rate Finished Product Finished Product-Annual Output Material Annual Consumption (Specify Units Hour) Description Requested level Data year level Description of Processing Unit Description Requested level Data year level (specify units) (specify units) Make Model: Serial No. ESTIMATED EMISSIONS ACTUAL E. POLLUTION CONTROL EQUIPMENT Overall ESTIMATION CHECK ALL BOXES THAT APPLY (TONS YEAR) AT THROUGHPUTS ollutant Type of Control Equipment Collection EMISSIONS METHOD □ New or previously unreported source* REQUESTED ABOVE (DATA YEAR) ☐ Requesting modification of existing permit†‡ Efficiency Primary Secondary CONTROLLED UNCONTROLLED (TONS) Change in emissions, throughputs or equipment! Particulate Baghouse 99.9 58.9 AP-42 ☐ Transfer of ownership (list previous owner in REMARKS)1 PMI Baghouse ☐ Previous APEN is expiring t 999 54.2 AP-42 SO. ☐ Request for Emission Reduction Credit†1 16,665.8 CEMS NO. Low Nox Burners 5.319.7 CEMS ☐ (Specify) VOC 75.2 Complete all applicable portions of APEN AP-42 CO 6273 AP-12 Complete "Requested level" values for permit limits ☐ CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR PLEASE USE APCD NON-CRITERIA REPORTABLE AIR Complete all information above box A, and those remaining portions POLLUTANT ADDENDUM FORM TO REPORT SUCII EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK. which reflect changes POLLUTANTS OR POLLUTANTS NOT LISTED ABOVE Signature of Person Legally Authorized to Supply Data: M/24/00 DATA YEAR (See Instructions on Reverse): 1999 Typed Name and Title: Date source began or will begin operation: Charles H. Fuller, Vice President, Generation and Thermal Energy THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this A \$100 FILING FEE IS REQUIRED Colorado Dept. of Public Health & Environment APEN# 26 expiration date, whenever a permit limitation must be modified, whenever control equipment FOR EACH NOTICE FILED. Air Pollution Control Division

Send completed forms with fees to:

4300 Cherry Creek Drive South, APCD-SS-B1

Denver, CO 80222-1530

see Regulation 3, Part A, s II.C.1.

is changed, and annually whenever a significant emission change occurs. For specific details

For Information, Call

(303) 692-3150

(instructions on reverse side)

FIRM NAME	Public Service Com	pany of Colorado, Pawn	ee Station	,			
PROCESS DESCRIPTION	Ν	Unit 1					
Distance to nearest prope	erty line from stack (or relea	se point)?	575	feet			
Stack height (or release p	point height)?	550	feet				
Chemical Abstract Service Number	Chemical Name	Reporting Bin	Control Equipment/ Efficiency	Emission Factor (lbs/10^6 Btu)	Emission Factor Source	Requested Emissions (lb/yr)	Data Year Actual Emissions (lb/yr)
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7664393	Hydrofluoric Acid	A	None	0.00032	Stack Test		8,389
7440020	Nickel	A	Baghouse - 95.1%	Coal Data//	AP-42/PISCES		338
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THIS FORM IS AN ADDENDUM TO APEN # 26.

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

Date: 09/24/00

I would like the Division to calculate my HAP emissions based on the production/consumption information listed on the APEN form.

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see Regulation	3, Part A, s ILC	il.					Send con	npleted forms	with fees to:	: 1	Denver, (CO 80222-1530				(303) 692	3150		

(instructions on reverse side)

FIRM NAME	Public Service Com	pany of Colorado, Pawnee	Station	,			
PROCESS DESCRIPTION	N	Unit 1					
Distance to nearest prope	erty line from stack (or relea	ise point)?	575	feet			
Stack height (or release p	oint height)?	550	feet				
Chemical Abstract Service Number	Chemical Name	Reporting Bin	Control Equipment/ Efficiency	Emission Factor (lbs/10^6 Btu)	Emission Factor Source	Requested Emissions (lb/yr)	Data Year Actual Emissions (lb/yr)
7647010	Hydrochloric Acid	· A	None	0.0007	Stack Test		24,577
7664393	Hydrofluoric Acid	A	None	0.00032	Stack Test		11,235
7664939	Sulfuric Acid	В	None	0.00051	Stack Test		17,906
7440020	Nickel	A	Baghouse - 95.1%	Coal Data/A	P-42/PISCES		290
50000	Formaldehyde	Α	None	0.00024 lbs/ton	AP-42		505
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THIS FORM IS AN ADDENDUM TO APEN # 33

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

Date: 4/23/99

I would like the Division to calculate my HAP emissions based on the production/consumption information listed on the APEN form.

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PERSON TO	CONTACT REGARDIN	G THIS INFORMA	TION	Gary Magn	 -					ITLE Environmen	nal Coordi	nator	_	PHONE	(303) 571	-7026	
	ESCRIPTION OF THIS				ver Generati	on			 .	 					<u> </u>		
A. GENERAI	LINFORMATION	Normal	Operation of T	his Source	Process :	Seasonal Th	roughput (%	of Annual)	Τ	ADDITIONAL IN	IFORMAT	ION OR R	EMARKS	S:			
No. of E	mployees Land	Area Hours/Day	Days/Week	Weeks/Yea	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov									
B. STACK O	R VENT INFORMATI	ON (Identify below	which stack if	plant has two	o or more; re	fer to attach	ed sketch of p	plant layout	1)					: <u>-</u>			
Height	Diameter	Temp	eralure	Flow Rate		Velocity		Moisture		Plant ID No. for St	lack						
	ft	n L	°F		ACFM	<u> </u>	ſt/min	<u> </u>	%								
	Combustion Unit		Design Inpu (10 ⁶ BTU) or Outp	TIR) Ki	nd of Fuel Burned	Amini	al Fuel Consu	imption	(B	I Heating Value: TU/Ib, BTU/gal, or BTU/SCF)	Per Cent	by Weight	Season	al Fuel Use (% of Ann	ual Use)	Space Hig (% Ann.)
Boiler #1	Compasiion Cim		(HP/kV	•	Danka	Requested	Laval Data	a vear level	-1	0. 5. 6.50.	Sulfur	Ash	Deg Eul	Mar-May	Inn Anal	San Mau	-
Doner #1		<u> </u>	(1178.5	·	Coal	requested		2,909 tons		8,315 BTU/lb	0.38	4,64	Dec-rea	Wint-Wink	7001-Aug	361-1401	
Make/Model:	_ 	— <u> </u>	 		Gas	ļ		1,675 mcf		.062 BTU/sef	0.38	7.07	 	<u> </u>			-
Serial No.:		8			Ons .	ł		1,075 11101	- '	,002 B1 C/sci		 		 			
<u> </u>	SINFORMATION	0006151	-\		RAW MATE	DIALS			Proces	s Design Rate	l Fi	nished Prod	<u> </u>	Finish	ed Produc	ا میرین کے د	Output
	S II I OKINATION	<u>5</u>	·					—i		_	l .						
Description of	Processing Unit	_		terial ription		Annual Con ited level	Data year l		(Specif	y Units/Hour)		Description		Requests (specify	1		year level ify units)
				1	1												
hlake/hlodel:			1		1		·							1			
Serial No.:																	
E. POLLUT	ION CONTROL EQUI	PMENT	Overall		STIMATE	OISSIIAB C	NS	ACTU	AL.	HOITAINITES		СН	ECK ALI	BOXES T	HAT APP	LLY	
Pollutant	Type of Contro	l Equipment .	Collection Efficiency	(TON	SA'EAR) A' REQUEST	T THROUG ED ABOVI		EMISSIO (DATA Y	- 6	METHOD		or previousl esting modi			imit†‡		
	Primary	Secondary		CONTI	ROLLED	UNCON	TROLLED	(TON	S)		⊠ Chan	ige in emissi	ions, thro	ughputs or e	quipment	ţ	
Particulate	Baghouse		99.9					45		AP-42	C) Trans	ifer of owne	rship (list	previous ov	vner in RE	MARKS	;)‡
PN110	Baghouse		99.9					42.		AP-42	D Previ	ous APEN i	s expiring	#			
SO _x								13,92	29	CEMS	□ Requ	est for Emis	sion Redi	iction Credi	1†‡		
NO _x	Low Nox Burners	,		-		1		3,87	3	CENIS	□ (Spec	ify)					
voc								59		AP-42	 Compl 	ete all appli	cable por	tions of API	N		-
co					_			490		AP-42	† Compl	lete "Reques	ned level	values for	permit lim	its	
PLEASE US	e apcd non-criteri	A REPORTABLE A	JR	CHECK	HERE IF	YOU WISH	THE DIVISI	ION TO C:	ALCUL	ATE YOUR	‡ Compl	lete all infor	mation at	ove box A,	and those	remainin	g portions
POLLUTAN	T ADDENDUM FORM	TO REPORT SUCH	Ţ	EMISSION	IS. SEE "EI	MISSION E	STIMATES"	' INSTRUC	CTION	S ON BACK.	which i	reflect chang	ges				- '
<u> </u>	TS OR POLLUTANTS I		√E														
Signature of	Person Legally Authorized	d to Supply Data:						DATE:	7/98	,	DATA Y	EAR (See I	nstruction	is on Revers	e):	1997	7
Typed Name		U Fuller Committee	lanana C-	adla Gami		:					Date sour	ce began or	will begi	n operation:			
Fring vom		H. Fuller, General M			=:	u No con	10 0001 112	CD 10 ·			11.05	• • • • • • • • • • • • • • • • • • • •		ABCNI	26		
11	E IS VALID FOR FIVE YE te, whenever a permit limits		•		11		IS REQUIR	NI NI		Dept. of Public Hea on Control Divisio		ronment		APEN#	26	of	45
11	ie, waenever a permit limits id annually whenever a sign			• -	11	cu wo i ici	L FILED.	11		on Control Divisions Ty Creek Drive So		14.22.0		For Inform	ation Cal	11	
	n 3. Pari A. a II.C.I.		2- account t. At \$		ll l	inleted form	s with fees to	- 11 -		ny eneek biive so n 80222-1530	, 232 06	. J. J.		(303) 692		••	

(instructions on reverse side)

			(manuchons on	leverse side)			
FIRM NAME	Public Service Con	npany of Colorado, Pawne	e Station				
PROCESS DESCRIPTION	N	Unit 1					
Distance to nearest prope	erty line from stack (or relea	ise point)?		feet	· -		
Stack height (or release p	point height)?	550	feel				
		·					
Chemical Abstract Service Number	Chemical Name	Reporting Bin	Control Equipment/ Efficiency	Emission Factor (lb/10^12 Blu)	Emission Factor Source	Requested Emissions (lb/yr)	Data Year Actual Emissions (lb/yr)
7440-38-2	Arsenic	· A-1	99.9	684	~** AP-42	•	733
7440-47-3	Chromium	A	99.9	1,910 `	AP-42		806
7439-96-5	Manganese	A	99.9	1,604	AP-42		261
7440-02-0	Nickel	Α	99.9	1,160	AP-42	•	1,846
50-00-0	Formaldehyde	Α	0	112	AP-42		3,637
<u> </u>							
L	ļ <u>-</u>	<u> </u>		•			
00061							
<u> </u>							·
<u> </u>	<u> </u>		•			<u> </u>	
52							
			,				
	1	<u> </u>	<u> </u>	· · · · · · · · · · · · · · · · · · ·			

THIS FORM IS AN ADDENDUM TO APEN # 26

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

I would like the Division to calculate my HAP emissions based on the production/consumption information listed on the APEN form.

AIK P	CLLU	IAN	11 FV	MIS	SION	N	THEE			rERN	AIT N	0.:			AIRS	ID.:				
FIRM N	AME Pu	blic Ser	vice Co	mpan	v of Cole	orado	0								-					
	FUEL INFORMATION Design Input Rate (16 b BTU/HR) Consumption Combustion Unit Consumption of Consumption Consumption Consumption of Consumption Co																			
							Brush, CO 8072	3												
HOME-BASE	FOR PORTA	BLE SOUR	CES					647												
						_						_ 7	TITLE Team Lead	Air & W	ater Program	ns	PHONE	(303) 57	1-7047	
GENERAL D	ESCRIPTION	OF THIS P		CHEST STREET	THE RESERVE THE PERSON NAMED IN		THE RESIDENCE OF THE PARTY.	The second second		-		-		desirence and	-		WHITE COM			
		-										-	ADDITIONAL IN	FORMA	TION OR R	EMARKS	S:			
	R VENT INFO		ON (Identify						ched ske											
Height		Diameter		Tempe		Flow I		,			loisture		Plant ID No. for S	lack						
			ft	_				-		-		200								
C. FUEL IN	FORMATION								ual Fuel	Consum	ption		_	Per Cent	by Weight	Seasona	l Fuel Use	(% of An	nual Use)	Space Hig
Durwintian of	Combustion II																			(% Ann.)
	Combustion C	nit					Burned			-		4	or BTU/SCF)	2.12				1.		
Boiler #1			- 0) -	(HP/kW	v)	Cont	Requeste	d level			\vdash	10.640	_		Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	
Make Model:						_		_	-			-	10,348	0.37	7.92	_	_		_	_
Serial No.:			— 8	3 —			Cas	_	\neg	100,3	33 mc1	+								
D. PROCESS	INFORMAT	ION		ž =	-		RAW MA	TERIALS			1 1	Proces	ss Design Rate	Fi	nished Produ	ict	Finis	hed Produ	ct-Annual	Output
			9	n S	Ma	terial		Annual Co	onsumpti	ion	_		_		Description					
Description of	Processing Uni	it			Descr	ription	Requ			-	_		.,,							
Make Model:				_				-												
Serial No.:																				
E. POLLUTI	ON CONTRO	L EQUIP	MENT		Overall		ESTIMAT	ED EMISSIO	ONS		ACTUA	AL.	ESTIMATION		CHI	ECK ALL	BOXES	THAT AP	PLY	
Pollutant	Type	of Control	Equipment			(TONS/YEAR)	AT THROU	GHPUT	S	EMISSIO	NS	METHOD	□ New	or previousl	y unreport	ted source			
					Efficiency						DATA YE	EAR)		□ Requ	esting modif	fication of	existing p	ermit†‡		
	Prima	u.	Second	lary		CC	ONTROLLED	UNCO	NTROL	LED	(TONS	5)								
Particulate						_		_		_		_					-	wner in RI	EMARKS)	\$
PM ₁₀					_	_				_	40		AP-42			_	-			
SO _x						_				_	11633					sion Redu	ction Cree	lit†‡		
NO,						_				_										.
VOC						_		_		_		_								
со	- A BAND AND AND	CDITUDIA	DEBORE	DI C		0.00														
	LADDENDUM				R		SIONS. SEE "I				,				lete all infon reflect chang		ove box A	, and those	femaining	portions
	TS OR POLLU				E	ENIIS	SIONS. SEE	ENIISSION	ESTINI:	VIES IN	SIRCE	HON	S ON BACK.	which	reflect chang	cs				
	ersop Legally				-					D	ATE:	_		DATAY	EAR (See In	structions	on Rever	se):	`	
	Colons	Phy	mh le	~m	In For						5-	1-	97						1996	
Typed Name	and Title:													Date sour	ce began or	will begin	operation	c		
					d, Air & Wate	-														
	E IS VALID FOR						- 11	FILING FE		-			Dept. of Public Hea		ironment		APEN #		of	
							Ipment FOR E	ACH NOTIC	EFILE	D.			ion Control Division		ee D1		Fas Info	mation C		
	d annually when	_	rant emissio	n cnange	occurs. For sp	ecine d		ompleted form	ne with 4	Same to:			rry Creek Drive Sox O 80222-1530	in, APCD	-99-DI			mation, Ca		
are tregalaction	3, Part A, s II.C						ligetid co	impresed form	is with I	ees to.	Brseij/	, es, c	00224-1330				(303)69	4-3130		

(instructions on reverse side)

FIRM NAME Public Service Company of	lorado, Pawnee Station	
PROCESS DESCRIPTION	Unit 1	_
Distance to nearest property line from stack (or releas	oint)?feet	_
Stack height (or release point height)?	550 feet	

Antimony compounds Arsenic compounds Beryllium compounds Cadmium compounds	A A A	NA 96.7 99.8	NA 684	NA AP-42	NA 1007	NA
Beryllium compounds Cadmium compounds	A			AP-42	40027	
Cadmium compounds		99.8			40037	716.0
	Α		81	AP-42	287	5.1
01	_ ^	94.9	44	AP-42	4016	71.8
Chromium compounds	A	98.7	1,910	AP-42	44042	787.7
Cobatt compounds	A	99.3	NA	NA	NA	NA
Lead compounds	A	99.3	507	AP-42	6295	112.6
Manganese compounds	A	99.5	1,604	AP-42	14225	254.4
Mercury compounds	A	78.2	16	AP-42	6187	110.6
Nickel compounds	A	95.1	1,160	AP-42	100819	1803.1
Selenium compounds	A	98.4	NA	NA	NA	NA
Thallium compounds	A	NA	NA	NA	NA	NA
Formaldehyde	A	0	112	AP-42	5456	3552.9
				- ,	-	
	Cobalt compounds Lead compounds Manganese compounds Mercury compounds Nickel compounds Selenium compounds Thallium compounds	Cobalt compounds A Lead compounds A Manganese compounds A Mercury compounds A Nickel compounds A Selenium compounds A Thallium compounds A	Cobalt compounds A 99.3 Lead compounds A 99.3 Manganese compounds A 99.5 Mercury compounds A 78.2 Nickel compounds A 95.1 Selenium compounds A 98.4 Thailium compounds A NA	Cobalt compounds A 99.3 NA Lead compounds A 99.3 507 Manganese compounds A 99.5 1,604 Mercury compounds A 78.2 16 Nickel compounds A 95.1 1,160 Selenium compounds A 98.4 NA Thallium compounds A NA NA	Cobalt compounds A 99.3 NA NA Lead compounds A 99.3 507 AP-42 Manganese compounds A 99.5 1,604 AP-42 Mercury compounds A 78.2 16 AP-42 Nickel compounds A 95.1 1,160 AP-42 Selenium compounds A 98.4 NA NA Thallium compounds A NA NA NA	Cobalt compounds A 99.3 NA NA NA Lead compounds A 99.3 507 AP-42 6295 Manganese compounds A 99.5 1,604 AP-42 14225 Mercury compounds A 78.2 16 AP-42 6187 Nickel compounds A 95.1 1,160 AP-42 100819 Selenium compounds A 98.4 NA NA NA Thallium compounds A NA NA NA NA

THIS FORM IS AN ADDENDUM TO APEN # 15

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

Signature: Olan Plant for Mont Fox

Date: 5-1-97

Firm Name: Public Service Company of Colorado -Pawnee Station Permit: C11M0674

Mail Address: _550 15th Street, Suite 1000, Denyer, CO 80202 Plant Location: 14940 Cnty Rd 24, Brush, CO 80723 County: Morgan

Person to Contact Regarding this Information: Mark R, Fox. P.E. _ Title: Team Lead, Air & Water Quality Programs Phone: _(303) 571-7047

General Description of this Plant's Function: Electric Power Generation

A. GENERAL INFORMA	NOIT		Normo	ıl Operatio	on of Plant			Proc	ess Sea	sonal Thro	ughput	(%) of Annual	1		ADDITIONAL	INFORM	ATION O	R REMARK	s		
No. Of Employees	Land Area 1730 acres		Hrs/Do		Hrs/Year 8760	Days/V	٧k	Dec	feb	Mar-M	Aay	Jun-Aug	s	Sep-Nov	Corrections	to 95 Upo	iale				
B. STACK OR VENT INF	ORMATION Edentify	halowa	blob sta	ok W mlant	has hun or	move: refer to	attache	d skatch of	plant le	nunud l											
Height	Diameter	_	perature		nas Iwo or	Flow Rate		Velocity	piani k	Molst.	70		Plant	ID for Stac	k						
550 ff	23.5 ft	32				2251000 A				30			\$001		_						
C. FUEL INFORMATION Description of Combustion				Design R (106 BT		Kind of Fue	Burned		ested	Consumpt Data Yr. Level		fuel Heating \ (BTU/ib, BTU/g			Per Cent by Sulfur	Weight Ash	Seaso	onal Fuel Us	e (%of Ann	ual Use)	Space Htg (% annual)
#1 Boller		'	٦			Coal				2193837 tons		8880 BTU/Ib			0.38	4.8	Dec-fel	May- May	AnAug	Sep-Nev	
Make/Model:Foster Whee	er 2-79-2381	•	\dashv	_		Gas				174933 /	ncf	1069 BTU/scf			0.0143	ng	+-	+-	+		-
Serial No.na		0				OII				3121 g	-	134766 BTU/go			0.1	.1					
D. PROCESS INFORMA	TION	0006		Rav	w Materials	Used		Materials A	Annual			n Rate		Finishe	ed Product De	scription	R	nished Prod	luct-Annua	Output	
Description of Combustion	Unit	061	_	Des	cription		-	ested	Data		ppec	ily onity/hoo		\top			R	equested L	ivel	Data Y	ear Level
		55		$\overline{}$					1					_							$\overline{}$
Make/Model:		. 51																			
Serial No.			-																		
E. POLLUTION CONTR	E. POLLUTION CONTROL EQUIPMENT ESIMATED EMISSIONS (TONS/YEAR) AT Actual Emissions (Data THROUGHPUTS REQUESTED ABOVE Year) 12/31/95 Estimation Method															CHEC	K ALL BOX	S THAT AP	PLY		
	Type of Control Equ	ulpment		Overall Collections Efficience		Controlled		Uncon	trolled			(in Tons)					□ Re	w or previous of the state of t	odification	of existin	g
Pollutant	Primary \$6	econdary												+			o Tro	nster of ow	nership (list	previous	owner In
Particulate						1					53			AP-42				ARKS section			
PM10						1					48			AP-42			41	location of			
\$02											15120			CEM			41	vious APEN			
NO2											5968			CEM			41	andatory up			
co		-				000000000000000000000000000000000000000					552			AP-42			41	quest for er			
								908 864400000	8.000000000								4	npiete all a			
PLEASE USE APCD HAP AD EMISSIONS OR OTHER POL			AZARDO	DUS AIR PC	OLLUTANT	INSTRUCTIO			DIVISIO	N TO CAL	CULATE	YOUR EMISSION	ONS. S	SEE "EMISSIO	ON ESTIMATES		± Co	mp ie le all	Information	above b	ed values') xx A, and ct changes.
Signature of Person Legal	ly Authorized to Supp	y Data:		ĺ	Mark	775	Z-X	2				Dale Aug	e: just 22,	1996			DA	TA YEAR 54	• Instructio	ns of Rev	erse):
Typed Name and Title: A	Aark R. Fox, P.E., Tean	n Lead, A	ir and V	Valer Qua	ility													1e Source b 11/1/81	egan or wi	Il begin C	peration:
THIS NOTICE IS VALID FOR must be modified, whene						ration date, v	vhenever	a permit ii	mitation	n	A \$100 FI FOR EAC	LING FEE IS REQU H NOTICE FILED	JIRED		o: Colorado D		f Public i	lealth and		APEN	# of
														1						AIRS Use	ID (APCD

							1 OLL				014	110		Beer			DEDAM	TNO	01167	4
IRM NAL						ADO-PA	AWNEE STATIO										PERIVI		C1167	
IAIL ADE	RESS P.O	BOX 840, D	DENVER.	CO 80201	-0840			P	LANT LOCAT	ION	14940 C	OUNT	Y RD, 2	4. BRUSI	H, CO			COUNT	Y_MORG	AN
PERSON T	O CONTAC	T REGARDI	ING THIS	INFORM	ATION_		MARK R. FOX	T	TTLETEAN	M LEAD, AIR	WATER	PROGR	RAMS			PHONE_	(303) 294-	8179		
GENERAL	DESCRIPT	ION OF THI	S PLANT	S FUNCT	ION_E	LECTRI	CITY GENERA	TION								FEDERA	AL TAX I.	D. NO		
A. GEN	ERAL INFO	RMATION	Nom	nal Operat	ion of Pla	nt	T	Proces	s Seasonal Thr	oughput (% of	Annual)	T	ADDIT	IONAL I	NFORMA	TION O	R REMAR	RKS:		
No. of E	mployees	Land Area	Hour	rs/Day	Hours/Y	ear	Days/Week	Dec-F	eb Mar-May	Jun-Aug	Sep-N	ov								
	K OR VEN						plant has two or													
Height		Diameter		Temperatu	re °F	Flow	Rate ACF		elocity	Mois	ture			No. for S	tack					
	n		n l							ft/min			Unit #1							
C. FUEL	INFORMAT	LION				gn Rate	Kind of Fue	ıl 📗	Annual Fuel C	Consumption		leating V		Per Cent	by Weight					Space Hig
Description	n of Combu	stion Unit			(10- 8	TU/HR)) Burned	Req	uested level	Data year	(BTU/It	TU/SCF		Sulfur	Ash	Dec-Fel	Mar-May	Jun-Aug	Sep-Nov	(% Ann.)
P.C. Boile	r			_			Sub-Bit			1816994 tons				.33	4.7					
Make/Moo				0			Coal													
	PROCESS INFORMATION Raw Materials Used Raw Materials-Annual Consumption Design Rate Finished Product Finished Product Finished Product																			
Descriptio	n of Process	ing Unit		56		De	scription	Reque	sted level D	ata year level	(Specif	y Units	/Hour)		Descriptio	n 	Request	nd level	Data	car level
Make/Mo	del:													1						
Serial No.	:			_										 						
E. POLLU	JTION CON	TROL EQUI	IPMENT		Ove	rall I	USTIMA	TED EX	ISSIONS *	ACTUA	J. I	EST	IMATIC	N		CHECK	C ALL BOX	YES TUA	r APPI V	
Pollutant		ype of Contro		ent	Colle	ction	(TONS/YEAR)	AT TH	ROUGHPUTS	EMISSIC	SNC		ETHOR			previous	sly unrepor	ted source	•	1
					Effici	ency	REQUE			(DATA Y	EAR)						ification of			. 1
Particulate		mary	Secon	ndary	99.2		CONTROLLE		ONTROLLE	341.6 tons		IRS					ions, throu			F REMARKS
PM ₁₀	010				97.7					225.9		IRS				of box A		previous	owner in i	· Liviria a
so.	000				1					9484.7		EM			Relocat					
NO'	029				57.4					8127.4	c	EM					is expiring		net	ı
VOC	000									63.6		IRS					ssion Redu			
co	000		n in in i n	0.001.000						545.1	A	IRS			· Comple	te all app	plicable por	tions of A	PEN	
		HAP ADDE					CHECK H	IERE II	F YOU WISH	THE DIVISIO	N TO CA	ALCUL	ATE Y	OUR			d areas ('Re			
		LISTED AE		ONS OR	OTHER	- 1				ESTIMATES"							ormation at		-	
		egally Author		Data:	/ /	_						DATE:	27-9	75	STATE OF THE PARTY NAMED IN		See Instruct			994
Typed Na	me and Title		TEAN	/ -	- 10	PROCE	11240					1 '			Date so	surce beg	an or will b	egin open	tion:	
	МА	RK R. FOX,	IEAM L	EAD, AIK	WAIER	PROGR	rvwi2						_							
							be filed prior to			ING FEE IS		IRED			DEPART	MENTO	F HEALT	н		
							never control change occurs. I		FOR EACE	I NOTICE I	FILED.			D-SS-BI	DEFART	MEHI O	" HEAL!	APEN		OF
		Regulation 3,			- Carrie Ch				For informati	on, call (303)	692-3150	0.	4300	Cherry (Creek Driv			AIRS I	D (APCD	USE)
									APCD FORM MA ((22)			Den	ver, Colo	rado 8022	4-1330				

Submutted to State

AIR POLLUTANT EMISSION NOTICE

				AII	POLLO	IANI		DIN INC							
FIRM NAME	PUI	BLIC SERVIC	E COMPANY O	F COLORADO-	PAWNEE STATION						_	PERM	IT NO	C1167	4
MAIL ADDR	ESS_P.O. I	BOX 840, DE	NVER, CO 8020	01-0840		PLANT LOCA	TION	14940 COUNT	Y RD, 24	4, BRUSH, CO			_COUNT	Y_MORO	AN
PERSON TO	CONTACT	REGARDING	THIS INFORM	MATION	MARK R. FOX	TITLE	TEAM LE	AD, AIR/WAT	ER PRO	GRAMS		PHONE	(303) 29	4-8179	
GENERAL D	ESCRIPTIO	ON OF THIS P	LANT'S FUNC	TION ELECTI	RICITY GENERATION	ON					_FEDER	AL TAX I	D. NO		
	RAL INFOR		Normal Open			rocess Seasonal Th	roughput (% of A	Annual)	ADDITI	ONAL INFORM	IATION	OR REMA	RKS:		-
No. of Em	ployees	Land Area	Hours/Day	Hours/Year	Days/Week D	ec-Feb Mar-Ma	y Jun-Aug	Sep-Nov							
B. STACK	OR VENT	INFORMATIO	ON (Identify be	low which stack is	f plant has two or mo	ore; refer to attach	ed sketch of plant	layout)							
Height	ft I	Diameter	ft Temperat	ore Flo	w Rate ACFM	Velocity	ft/min Moist		Plant ID 1 Unit #1	No. for Stack					
C. FUEL IN	FORMATIC	ЭN		Design Rate	Kind of Fuel	Annual Fuel	Consumption	Fuel Heating	Value: I	Per Cent by Weig	ht Season	nal Fuel Use	(% of A	nnual Use)	Space Hig
Description	of Combustion	on Unit		(106 BTU/HI	R) Burned	Requested level	Data year	(BTU/Ib, BTU/ BTU/SCI		Sulfur Ash	Dec-F	eb Mar-May	Jun-Aug	Sep-Nov	(% Ann.)
P.C. Boiler					Nat. Gas		124.632 MMCF			0 0					
Make/Model	l:		೧_										1		
Serial No.															
D. PROCES Description			0006157			w Materials-Annua equested level I	al Consumption Data year level	Design Ra (Specify Units		Finished Pro Descrip			shed Prod tad level	Data 1	Output year level
Make/Mode Serial No.:	l:														
Pollutant		ROL EQUIPM e of Control E		Overall Collection Efficiency	(TONS/YEAR) A	EMISSIONS THROUGHPUT ED ABOVE	S EMISSION (DATA YE	NS M	IMATIO (ETHOD	□ New	or previou	K ALL BO usly unreport dification of	ted source	•	
	Prima	гу	Secondary	-	CONTROLLED		0000	,		☐ Chan	ge in emis	sions, throu	ghputs or	equipment	
Particulate 0				99.2			0.2 ton	AIRS			n of box		t previous	owner in	REMARKS
	010			97.7			0.2	AIRS			ation of S				
	000			-			34.3	AIRS				is expiring			
	000						0.1	AIRS				ate or defer			
co	000			-			2.5	AIRS				plicable po			
HAZARDO	US AIR PO		OUM FORM TO MISSIONS OR		CHECK HER	RE IF YOU WISH SEE "EMISSION				DUR † Com	olete shade	d areas ('R formation a ons which r	equested' bove box	values) A, and tho	sc
			to Supply Date	116.1 1	7,				7-95	TOTAL		(See Instruc			994
Typed Nam		K R. FOX, TE	AM LEAD, AI	R & WATER PRO	,	,	S2.24	11-0	1 13		source be	gan or will	begin oper	ation:	
expiration equipment	ICE IS VA date, whene is changed,	LID FOR FIV ver a permit l and annually	E YEARS. A r	evised notice shal be modified, who	l be filed prior to th	FOR EAC	ING FEE IS H NOTICE F	ILED.	APCI 4300	o: ORADO DEPAR D-SS-B1 Cherry Creek Deer, Colorado 80	rive South		APEN	# D (APCD	OF

EPA8TEP009685

	_		E GOLD LLIV OF	COLOBAL	O DA	WHEE STATE	ON										PERMI	T NO	C11674	1
TRM NAM			E COMPANY OF		JU-PA	WHEESTATE								4 PPH				COUNT	Y_MORG	AN
AAIL ADD	RESS P.O	. BOX 840, DE	NVER, CO 80201	-0840			PI	LANT LOC			14940 CC				H, CO					nii .
ERSON TO	CONTA	CT REGARDING	G THIS INFORM	ATION		PETER J. COL	ILMIA	тп	LLE_	CHIEF EN	IVIRONN	MENT	TAL SCI	ENTIST			_PHONE_		-2810	
BENERAL	DESCRIPT	TION OF THIS I	PLANT'S FUNCT	TION ELE	CTRIC	CITY GENERA	TION										L TAX I.I			
		ORMATION	Normal Operat					s Seasonal T	hrou	ghput (% of A			ADDIT	IONAL	INFORMA	TION O	R REMAR	KS:		
No. of E		Land Area	Hours/Day	Hours/Yea	r I	Days/Week	Dec-Fe	b Mar-M	ſay	Jun-Aug	Sep-No	ov								
i de									_											
B. STAC	K OR VEN	T INFORMATI	ON (Identify belo	ow which sta			more; re	efer to attac	hed s	sketch of plant	layout)		El ID	N 6	Cu. I					
Height		Diameter	Temperatu		Flow			locity		/min Moist		%	Unit #1	No. for	Stack					
	n		ft	°F		ACF								Des Car	. L. Waish	Teasons	I Fuel Use	(% of Ar	nual Use)	Space Htg
C. FUEL I	NFORMA	TION		Design (10 ⁴ BT		Kind of Fu		Annual Fue		nsumption			g Value: U/gal, or				Mar-May			(% Ann.)
Description	of Combu	istion Unit		(IO BI	U/HK)	Bullied	Requ	uemed level						Sulfur	Ash	Dec-Pet	Mar-May	Juli-Yug	361-1404	
· · ·				-		Sub-Rit			1	2013357 tons	-			.35	4.5					
P.C. Boile	r										_					-	-		_	
Make/Mod	el:					Coal														
Serial No.			— <u>ი</u> –	1																
			= ĕ =		M	atadala Haad	Daw M	aterials. Ann	ual (Consumption	De	sign l	Rate	T Fir	nished Prod	uct	Fini	shed Prod	uct-Annual	Output
	ike/Model:																			
Description	Sub-Bit 2013357 tons .35 4.5 Make/Model: Coal Crial No. Raw Materials Used Raw Materials-Annual Consumption Design Rate Finished Product Finished Product Annual Consumption Coal Design Rate Finished Product Finished Product Annual Consumption Coal Design Rate Finished Product Annual Coa																			
			_ ~ -											+						
Make/Moo	PROCESS INFORMATION escription of Processing Unit Raw Materials Used Raw Materials-Annual Consumption Design Rate Specify Units/Hour Description Requested level Data year level Description Requested level Data year level Da																			
Serial No.	:																			
E. POLLI	PROCESS INFORMATION scription of Processing Unit Raw Materials Used Raw Materials-Annual Consumption Design Rate Specify Units/Hour Description Requested level Data year level Description Requested level Data year level Policy Description Requested level Data year level																			
Pollutant		Type of Control		Collect	- 11	(TONS/YEAR			rts	EMISSIO			метно	D	□ New o	r previous	ely unreportification of	ted source	ermittt	
Circulation				Efficier	ncy	CONTROLLE	ESTED /	**********	ED	(DATA YI	EAR)				Chang	e in emiss	sions, throu	ghputs or	equipment	‡
Particulate		imary .	Secondary	99.2	-	CONTROLL	D CIN	CONTROL		362.4 tons	A	IRS			☐ Transf	er of own	ership (Lis	t previous	owner in	REMARKS
PM ₁₀	010	_		97.7	\dashv					239.6	A	IRS				of box				
O,	000									10509.7	С	EM			☐ Reloca		is expiring	rt		
10,	029			57.4						9005.7		EM			☐ Manda	tory upda	te or defer	red report	ing‡	
VOC	000									70.5		IRS			Reque	st for Em	ission Redu	uction Cre	dit†‡	
20	000			DEBORT.						604		AIRS			+ Comp	lete shade	plicable po	equested'	values)	
PLEASE	USE APC	D HAP ADDEN	DUM FORM TO EMISSIONS OR	OTHER		☐ CHECK	HERE I	F YOU WI	SH 7	THE DIVISIO	ON TO C	ALC	ULATE	YOUR	‡ Comp	lete all in	formation a	bove box	A, and the	se
		T LISTED ABO		OTHER		EMISSIO	NS. SEE	*EMISSIO)N E	STIMATES"	INSTRU	CTIC	ONS ON	BACK.			ons which			
ignature	of Person	Legally Authoriz	zed to Supply Data	: ()	7	1	1	0 `				DAT		- 1-		YEAR	(See Instru	ctions on l	Reverse):	1993
				Ku	1	- V - 1	con	lma					4/0	29/9 <u>4</u>	Data	ourse he	gan or will	hegin one	ration:	
Typed No	me and Ti	tle: ETER L COHL)	MIA, CHIEF ENV	/IRONMEN	TALS	CIENTIST							1	1	Date	outer or	5 01			
							40 41-20	A \$100 I	en i	ING FEE IS	SPECI	TRE	ED Mai	l to:				T		
THIS N	OTICE IS	honever a nermi	IVE YEARS. A r	be modified	d, whe	never control	to this			NOTICE	_		CC	DLORAD	O DEPAR	TMENT (OF HEALT	H APEN	1	of_3_
equipme	nt is chan	ged, and annual	ly whenever a sig	nificant em	ission	change occurs.	For							OO Cherr	B1 y Creek Dr	ive South		AIRS	ID (APCD	USE)
pecific	details see	Regulation 3, P	art A, § II.C.1.					For inform	natio	on, call (303)	692-315	0 .	D.	on Cherry	dorado RO	22.1530			AOTED	000000
															*			E٢	ABIEP	009686

RM NAM	M NAME PUBLIC SERVICE COMPANY OF COLORADO-PAWNEE STATION PERMIT NO. C11674																	
AIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840 PLANT LOCATION 14940 COUNTY RD, 24, BRUSH, CO COUNTY MORGAN																		
ERSON T	ERSON TO CONTACT REGARDING THIS INFORMATION PETER J. COHLMIA TITLE CHIEF ENVIRONMENTAL SCIENTIST PHONE (303) 294-2810																	
ENERAL DESCRIPTION OF THIS PLANT'S FUNCTION ELECTRICITY GENERATION FEDERAL TAX I.D. NO.																		
A. GENERAL INFORMATION Normal Operation of Plant Process Seasonal Throughput (% of Annual) ADDITIONAL INFORMATION OR REMARKS:																		
No. of E	No. of Employees Land Area Hours/Day Hours/Year Days/Week Dec-Feb Mar-May Jun-Aug Sep-Nov																	
	B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)																	
Height Diameter Temperature Flow Rate Velocity Moisture Plant ID No. for Stack ft ft ft 6 ACFM ft/min % Unit #1																		
C. FUEL I	NFORMAT	TION			esign Rate		el An	nual Fuel C	Consumption		eating Value:	Per Cen	t by Weight	Season	al Fuel Use	(% of An	nual Use)	
Description	of Combu	stion Unit		(10	of BTU/HR) Burned	Request	ed level			, BTU/gal, or TU/SCF)	Sulfur	Ash	Dec-Fel	Mar-May	Jun-Aug	Sep-Nov	(% Ann.)
.C. Boile	r					Oil			11.756 mgal			.36	0					
dake/Mod	el:			\neg						_			<u> </u>					
erial No.			— co															
	SS INFOR		0006159		Raw M						sign Rate		ished Produ	ict	Finis	hed Produ	ct-Annual	Output
Description	of Process	ing Unit	- 5 -		D	Description Requested level			Data year level (Specify Unit			its/Hour) Description			on Requested level Data yes		ear level	
Make/Mod	lel:		9		 							-						
Serial No.	:				\vdash							+-						
E. POLLU	TION CON	NTROL EQUIP	PMENT	0	Overall		TED EMISS		ACTUA	L	ESTIMATI	ION		CHECK	ALL BOX	(ES THAT	APPLY	
Pollutant		Type of Control	Equipment		ficiency	(TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE			EMISSIO (DATA YE	метно	☐ Request			or previously unreported source* esting modification of existing permit†‡				
De et entere		mary	Secondary	00.0		CONTROLLE	D UNCON	TROLLER	2				Change	in emiss	ions, throug	ghputs or e	equipment	
Particulate PM ₁₀	010			99.2					0		IRS			r of own of box A	ership (List	previous	owner in R	REMARKS
SO,	000			0					0.3 ton		IR\$ IR\$		☐ Relocati					
NO.	000			0					.1	_	IRS				is expiring:			
VOC	000			0		****			0		IRS	-			te or deferm			
co	000			0					0	A	IRS				licable por			- 1
HAZARD	OUS AIR I	HAP ADDEN POLLUTANT LISTED ABO	NDUM FORM TO EMISSIONS OF OVE.	O REPO	RT				THE DIVISIO				† Complet ‡ Complet	te shaded te all info	d areas ('Re ormation ab	quested' v	alues)	
Signature of Person Legally Authorized to Supply Data: Out V. Cohlmic DATE: DATA YEAR (See Instructions on Reverse): 1993																		
Typed Name and Title: PETER J. COHLMIA, CHIEF ENVIRONMENTAL SCIENTIST Date source began or will begin operation:																		
expiration equipmen	THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § II.C.1. A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED. APCD-SS-B1 AIRS ID (APCD USE) For information, call (303)692-3150. FOR EACH NOTICE FILED. For information, call (303)692-3150.																	

TRM NAN	1EP	UBLIC SERVI	CE COMPA	NY OF	COLORA	ADO-PA	AWNEE STATE	ION										PERMI	T NO	C1167	4
MAIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840							PLANT LOCATION 14940 COUNTY RD, 24, BRUSH, CO							COUNTY_MORGAN							
PERSON TO CONTACT REGARDING THIS INFORMATION PETER J. COHLMIA TITLE CHIEF ENVIRONMENTAL SCIENTIST PHONE (303									_												
GENERAL	DESCRIPT	ION OF THIS	PLANT'S	UNCTI	ON_EL		CITY GENER										FEDER	AL TAX I.			
A. GENERAL INFORMATION Normal Operation of Plant Process Seasonal Throughput (% of Annual) ADDITIONAL INFORMATION OR REMARKS:																					
No. of E	imployees	Land Area	Hours/I	Day	Hours/Ye	ear	Days/Week	Dec-		-May	Jun-Aug	Sep-No	v								
B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)																					
Height		Diameter		perature	3		Rate	T	elocity		Moist		Т	Plant ID	No. for	Stack					
	ft		ft		°F		ACF	М		ft.	/min		%	Unit #1					-		
C. FUEL	INFORMAT	TION				n Rate	Kind of Fu	el	Annual F	uel Co	nsumption					t by Weigh	Season	al Fuel Use	(% of An	inual Use)	
Descriptio	n of Combu	stion Unit			(10- B)	TU/HR)	Burned	Re	quested leve	el		(BTU/Ib,	U/SC		Sulfur	Ash	Dec-Fe	bMar-May	Jun-Aug	Sep-Nov	(% Ann.)
P.C. Boile	r						Nat. Gas			18	0.232 MMCF				0	0					
Make/Mod	del:			_																	
Serial No.			{																		
	ESS INFOR		== 8	5 ==		Raw M	aterials Used	Raw)	Materials-Ar	nual C	Consumption		sign R		Fin	ished Produ		Finis	hed Produ	ict-Annual	Output
Description of Processing Unit		0	<u> </u>		De	scription	Requested level De		Data	Data year level (Speci		cify Units/Hour)			Description		Requested level I		Data y	ear level	
			<	,																	
Make/Mo																					
Serial No.	:													1							
E. POLLI	лон сон	TROL EQUIP	MENT		Oven				Missions		ACTUA		EST	TIMATI	ON		CHEC	K ALL BOX	KES THAT	T APPLY	
Pollutant	T	ype of Control	Equipment		Collect			REQUESTED ABOVE			EMISSIO (DATA YE							ously unreported source* odification of existing permit†‡			
2	Prin	nary	Seconda	у		* 12	CONTROLLE			LED	(DATA 12							sions, throu			‡
Particulate					99.2					0.000000	0.3 ton		IRS .					nership (List	previous	owner in l	REMARKS
PM ₁₀	010				97.7					000000000	0.3		RS			□ Relocat	of box				
SO, NO,	000									***********	0.1		RS					is expiring	t		
VOC	000							_		***********	49.6		RS			☐ Manda	lory upda	ate or defer	ed reporti		
co	000									20000000000	3.6		IRS					ission Redu			
		HAP ADDEN	DIM FOR	U TO P	FPADT						3.0	ļ^i	TR.S					plicable por			
		OLLUTANT				- 1	☐ CHECK I	HERE	IF YOU W	ISH T	HE DIVISIO	N TO CA	LCU	LATE Y	OUR			d areas ('Re			
		LISTED ABO					EMISSION	IS. SEI	E "EMISSIO	ON ES	TIMATES"	INSTRUC	TION	NS ON I	BACK.			formation al			ic .
Signature	of Person L	gally Authoriz	ted to Supply	Data:	P	太	1.6	shl.	ma			Ĺ	DATE		9/94	DATA	YEAR ((See Instruc	tions on R	everse): l	993
Typed Na	me and Title	ER J. COHLA	MIA, CHIEF	ENVIR						, alternative	***			1	/	Date se	ource beg	gan or will b	egin oper	ation:	
THIS NO	TICE IS V	ALID FOR FI	IVE YEARS	. A revis	sed notic	e shall	be filed prior t	to this	A \$100	FILIN	NG FEE IS	REOUI	REI	Mail	to:				7		
expiratio	n date, whe	never a permi	t limitation	must be	modified	l, when	ever control				NOTICE F			co		DEPART	MENT (OF HEALT	APEN	13	of 3
equipme	nt is change	d, and annuall	ly whenever	a signifi	icant emi	ission c	hange occurs.	For					-		CD-SS-B					D (APCD	USE)
es because of	ieranz «ee R	egulation 3, Pa	art A, 9 11.0	.1.					For Infor	metion	call (303)6	02-3150		430	O Cherry	Creek Driv	e South		1	()	

For information, call (303)692-3150.

			3		
PLANT SU	MMARY CHANGE	FORM			1
		CONTROL PERSON: PET	ER J. COHLMIA		
SOURCE 1D #: 087	70011	TELEPHONE #: 294	-2810	NUMBER OF EMPLOYEES:	
FEDERAL TAX ID #	#: <u>84-0296600</u>	PLANT PROPERTY AREA:	ACRES	DATA YEAR:1991	
			NT SUMMARY FORM. SPECIFIC DETAILS	S SHOULD ALSO BE CODED ON TH	E APEN UPDATE FORM.
PLEASE PRINT ALL	. INFORMATION IN A CLEAR	AND LEGIBLE MANNER.			
	OWNER COMPANY ADDRESS		LOCATION ADDRESS		
NAME:	PUBLIC SERVICE COMPANY O	OF COLORADO	PAWNEE STATION		
ADDRESS:	P. O. BOX 840		14940 COUNTY RD 24 (P.O. BOX	857)	
CITY, STATE:	DENVER, CO		BRUSH, CO		
ZIP CODE:	80201-0840	· ·	80723		
TELEPHONE #:	(303) 294-2810		(303) 842-5066		
FAX #:	(303) 294-2829				
EMERGENCY #:	(303) 571-7511		(_)		
	MAILING ADDRESS		BILLING ADDRESS		
NAME:	PETER J. COHLMIA - PUBLI	IC SERVICE CO.	PETER J. COHLMIA - PUBLIC SER	EVICE CO.	
ADDRESS:	P. O. BOX 840		P. O. BOX 840		
CITY. STATE:	DENVER CO		DENVER CO		

C 0006161

Z1P CODE: 80201-0840

TELEPHONE #: (303) 294-2810

FAX #: (303) 294-2829

EMERGENCY #: (303) 571-7511

P. O. BOX 840

DENVER, CO

80201-0840

(303) 294-2810

(303) 294-2829

DEPARTMENT USE ONLY
CODER:

SIGNATURE: Petr J. Cohlmia

	APEN UPDA	TE CHANGE F	ORM		DOINT DATA				
	SOURCE ID #:	0870011			POINT DATA				
	POINT #	PERMIT #	QUARTERLY TH (% TO TOTAL		ORMAL OPERATING (HRS DAY WEEK)	RATE	BOILER CAPACIT (BTUE6/HR)	(% USED)	r
	_01			/					
					STACK DATA				
	HEIGHT (FT)	DIAMETER (F	T) TEMPERA	TURE (F) FL	LOW RATE (CUFT/MI	N)	VELOCITY (FT/M	IIN) PLUME HEIG	HT (FT)
									_
				F	PROCESS DATA				
				SCC	MAXIMUM DESIGN RATE	SUI FUR	CONTENT	ASH CONTENT	HEAT CONTENT
	SCC CODE	SEQUENCE #	PROCESS RATE	UNITS	(SCC UNIT/HR)		WEIGHT)	(% BY WEIGHT)	(BTUE6/SCC UNIT)
	10100222		1,986,440	TON	, ———	0.3	1	4.60	17
				PC	OLLUTANT DATA				
	POLLUTANT	CONTROL EQUIPMENT	CONTROL EFFICIENCY (%)	EMISSION FACTOR (LBS/SCC UN	ASH/SULI	FUR	EMISSION FACTOR SOURCE	PERMITTED EMISSIONS (TONS/YEAR)	ESTIMATED EMISSIONS (TONS/YEAR)
	CO	000	0.00	0.6			C		596
0	voc		00.0	0.07			C		70
		025	57.4	21.0			A		8,885
0006162	SO ₂	000	00.0	10.44			A		10,369
62	TSP	010	99.2	10.0	A		C		366
	PM10	010	97.7	2.3	A		C		242
	LEAD	010	95.0	0.0133			C		1
			s	TART-UP DATE:		SOURCE	DESCRIPTION:	No. 1 STEAM GEN -	COAL
	DEPARTMENT USE	E ONLY	o	RIGINAL PERMIT	ISSUE DATE:		IS THIS	A FUGITIVE DUST SO	OURCE (Y/N): N
	CODER:		S	IGNATURE: R	tal. Cohi	mia		WISH TO HAVE YOU ATION HELD CONFID	

	APEN UPDAT	E CHANGE FO	DRM						
	SOURCE ID #:	0870011			POINT DATA				
	POINT # PERMIT # (% TO TOTAL				ORMAL OPERATING F (HRS DAY WEEK)			Y SPACE HEA (% USED)	AT
	_NA		/						
					STACK DATA				
	HEIGHT (FT)	DIAMETER (FT	TEMPERA	TURE (F) FI	LOW RATE (CUFT/MIN	I) VE	ELOCITY (FT/M	IN) PLUME HEI	GHT (FT)
				1	PROCESS DATA				
	SCC CODE	SEQUENCE #	PROCESS RATE	SCC UNITS	MAXIMUM DESIGN RATE (SCC UNIT/HR)	SULFUR CO		ASH CONTENT (% BY WEIGHT)	HEAT CONTENT (BTUE6/SCC UNIT)
	10100501		156	GALE3		0.30	_	0.00	137
				P	OLLUTANT DATA				
	POLLUTANT	CONTROL EQUIPMENT	CONTROL EFFICIENCY (%)	EMISSION FACTOR (LBS/SCC UN	ASH/SULF	UR F	MISSION ACTOR OURCE	PERMITTED EMISSIONS (TONS/YEAR)	ESTIMATED EMISSIONS (TONS/YEAR)
	СО	000	00.0	5.0		_	С		0
	VOC	000	00.0	0.2		_	C		0
C	NOx	000	00.0	24.0			С		2
00	SO ₂	_000	0.00	143.6	S		C		3
00061	TSP	010	99.2	2.0		_	С		0
163	PM10	010	97.7	1.0		_	С		0
	LEAD	010	00.0	0.0004		_	C	-	0
1			S	TART-UP DATE:		SOURCE D	ESCRIPTION: _	No. 1 STEAM GEN	- OIL
DE	EPARTMENT USE	ONLY	0	RIGINAL PERMIT	ISSUE DATE:	_	IS THIS	A FUGITIVE DUST	SOURCE (Y/N): N
CODER: SIGNATURE: Put J. Columba DO YOU WISH TO HAVE YOUR PROCESS INFORMATION HELD CONFIDENTIAL (Y/I									

	APEN UPDAT	E CHANGE FOR	М								
	SOURCE ID #: 0	0870011			POINT	DATA					
	QUARTERLY POINT # PERMIT # (% TO TOT					PERATING RA		BOILER CAPACITY SPACE H (BTUE6/HR) (% USED		T .	
	NA				/			 .			
					STACK	DATA					
	HEIGHT (FT)	DIAMETER (FT)	TEMPERA	ture (F)	FLOW RAT	E (CUFT/MIN)	VELOC	CITY (FT/MIN)	PLUME HEIC	SHT (FT)	
		 		.			 ,			 .	
				•	PROCESS	DATA					
٠	SCC CODE	SEQUENCE # . I	PROCESS RATE	SCC UNITS	MAXII DESIGN (SCC UN	RATE	SULFUR CONT (% BY WEIGH		CONTENT	HEAT CONTENT (BTUE6/SCC UNIT)	
	10100601		58	CFTE6			0.00	_	0.00	1,071	
	POLLUTANT DATA										
	POLLUTANT	CONTROL EQUIPMENT	CONTROL EFFICIENCY (%)	EMISSIO FACTO (LBS/SCC)	R	ASH/SULFU FLAG	EMISS R FACT SOUP	OR EN	ERMITTED MISSIONS DNS/YEAR)	ESTIMATED EMISSIONS (TONS/YEAR)	
	со	000	00.0	40.0			<u></u>	_		1	
	voc	000	00.0	1.4			G G G C			0	
C	NO _x	_000	00.0	550.0			<u> </u>	_		16	
00061	SO₂	_000	00.0	0,6	_		_ <u>ċ</u>			0	
61	TSP	010	99.2	3.0			<u> </u>	_		0	
64	PM10 '	010	<u>97.7</u> .	3.0	_		<u>. </u>			0	
	LEAD	010	00.0	0.0	_		<u> </u>			<u> </u>	
			5	START-UP DAT	E:	_	SOURCE DESC	RIPTION: No.	STEAM GEN -	NAT GAS	
DE	PARTMENT USE	ONLY	. (ÖRIGINAL PERM	IIT ISSUE DA	ATE:		IS THIS A FU	GITIVE DUST S	OURCE (Y/N): N	
İ	CODER:			; SIGNATURE:	Put		Invia .	DO YOU WIS	H TO HAVE YO		